

EXHIBIT A-7

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

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1 Bar none, is what he said, a cyber attack 02:49PM
2 by China right down to the local races. A cyber attack, 02:49PM
3 isn't that through computers? That's what Chris Krebs 02:49PM
4 said on national TV. I can't -- 02:49PM

5 Q. Now -- 02:49PM

6 A. If I had it here, I'd play it for you. 02:49PM

7 Q. -- has Christopher Krebs ever indicated 02:49PM
8 publicly that Smartmatic interfered with the 2020 02:49PM
9 election? 02:49PM

10 A. Like I said, all machines, a cyber attack, 02:49PM
11 right down to the local races. You're a part of machine 02:49PM
12 company. 02:49PM

13 The only way you do that is hacking in -- 02:49PM

14 THE COURT REPORTER: Please slow down. 02:49PM
15 Please. 02:49PM

16 A. The only way you do that is to hack into a 02:49PM
17 machine or to get into the machine. That includes 02:49PM
18 Smartmatic. Chris Krebs said this. I'm sorry he said 02:49PM
19 that about you guys. 02:49PM

20 Q. (BY MS. WRIGLEY) Sir, do you see that the 02:49PM
21 title of this exhibit is "Fired director of U.S. cyber 02:50PM
22 agency, Chris Krebs, explains why President Trump's 02:50PM
23 claims of election interference are false"? Do you see 02:50PM
24 that -- 02:50PM

25 A. Yeah. 02:50PM

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1 Q. -- on the first page? Do you see that, sir? 02:50PM

2 A. Uh-huh. 02:50PM

3 Q. Were you aware that Mr. Krebs gave an interview 02:50PM
4 with 60 Minutes in November 2020 about the 2020 02:50PM
5 election? 02:50PM

6 A. No. 02:50PM

7 Q. You weren't aware of that at the time -- 02:50PM

8 A. I've heard his statement. 02:50PM

9 Q. Okay. 02:50PM

10 A. He said it was the most secure. 02:50PM

11 Q. And do you see underneath here the subtitle is 02:50PM
12 "Chris Krebs, a life-long Republican, was put in charge 02:50PM
13 of the agency handling the election security by 02:50PM
14 President Trump a few years ago. When Krebs said the 02:50PM
15 election was the country's most secure ever, Mr. Trump 02:50PM
16 fired him. Now Krebs speaks to Scott Pelley"? Do you 02:50PM
17 see that? 02:50PM

18 A. Uh-huh. 02:50PM

19 Q. Okay. And are you aware in November of 2020 02:50PM
20 that Christopher Krebs, when he was head of the CISA 02:50PM
21 agency in charge of the election, issued a public 02:50PM
22 statement about the election being secure? 02:50PM

23 A. I heard the statement. I didn't know what he 02:50PM
24 ran or what he did. But I -- all I know is I was really 02:51PM
25 happy when three months later, he said the biggest 02:51PM

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1 threat to our country was a cyber attack made to the 02:51PM
2 local races from China. 02:51PM

3 That's like saying I watched really good on 02:51PM
4 my watch, but now we've got to worry about it because it 02:51PM
5 didn't happen when I was watching, because I could see 02:51PM
6 inside the machines. Chris Krebs lied. 02:51PM

7 Q. Do you see at the bottom of this page where it 02:51PM
8 has Chris Krebs speaking? Bottom of the paragraph, sir. 02:51PM
9 It says, "I have confidence." Are you with me? 02:51PM

10 Mr. Lindell, are you with me here? 02:51PM

11 A. Yeah, I'm reading it. Yes. 02:51PM

12 Q. "I have confidence in the security of this 02:51PM
13 election because I know the work that we've done for 02:51PM
14 four years in the support of our state and local 02:51PM
15 partners. I know the work that the intelligence 02:51PM
16 community has done, the Department of Defense has done, 02:51PM
17 that the FBI has done, that my team has done. I know 02:51PM
18 these systems are more secure. I know based on what we 02:51PM
19 have seen that any attacks on the election were not 02:52PM
20 successful." Do you see that? 02:52PM

21 A. Uh-huh. 02:52PM

22 Q. And in November of 2020, did you understand 02:52PM
23 that Christopher Krebs publicly stated the election was 02:52PM
24 secure? 02:52PM

25 A. I didn't know Chris Krebs. I heard Chris -- 02:52PM

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1 that some Christopher Krebs said that. But you've got 02:52PM
2 to understand, my -- where I was, all that stuff every 02:52PM
3 day, I spent 18 hours a day doing my own investigation. 02:52PM
4 Had nothing to do with what the media was saying. So I 02:52PM
5 had a hundred percent proof that something happened. We 02:52PM
6 better find out all these deviations. 02:52PM

7 It's like I get deviations every day in 02:52PM
8 numbers. I dig into them till I find the truth. And I 02:52PM
9 don't care what Chris Krebs, who I didn't even know what 02:52PM
10 he did back then, why he says that. 02:52PM

11 I was kind of like -- I go, yeah, I 02:52PM
12 remember that name when he said that's the number one 02:52PM
13 threat to our country. I mean, this -- this Chris 02:52PM
14 Krebs, I mean, he was obviously -- he was making it 02:52PM
15 secure. What do you think he's going to say? 02:52PM

16 Q. I'm going to hand to you what's been previously 02:52PM
17 marked as Exhibit 582, sir. This is -- for the record, 02:52PM
18 this is a page -- it shows where from the Internet of 02:53PM
19 Twitter it was printed up and the day it was captured. 02:53PM
20 This is a post on Twitter by Christopher Krebs when he 02:53PM
21 was at CISA. 02:53PM

22 A. Uh-huh. 02:53PM

23 Q. Do you see at the top where it says, "To be 02:53PM
24 clear on," and there's an arrow below? "I'm 02:53PM
25 specifically referring to the Hammer and Scorecard 02:53PM

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1 nonsense. It's just that, nonsense. This is not a real
2 thing. Don't fall for it, and think twice before you
3 share"? Do you see that, Mr. Lindell?

4 A. Uh-huh.

5 Q. Were you aware that Christopher Krebs, prior to
6 2021, had posted on Twitter about Hammer and Scorecard?

7 A. It's the first time I've read this.

8 Q. You've never seen this before, sir?

9 A. No.

10 Q. This didn't come up in your validation or
11 investigation mark?

12 A. Huh-uh. Not this with Chris Krebs.

13 Q. Okay. Did you ever investigate statements
14 that had been made by CISA related to Hammer and
15 Scorecard prior to 2021?

16 A. I -- I talked to gen- -- yes, I did. I talked
17 to generals that were involved. General McInerney,
18 directly involved. Bill Binney, directly involved.
19 People that were back there that built Hammer and
20 Scorecard that helped build it. Okay. They built it.

21 When you interview General McInerney or
22 Colonel Waldon or General Mike Flynn, they were there.
23 I had him and Dennis Montgomery in a room together.
24 It's like old friends talking.

25 You know, Dennis -- and I had General Flynn

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1 with Dennis Montgomery validate it right there. Yes,
2 sir. Here's what I did. Remember this? Remember this?
3 Remember this? It's real. You can't sit and tell me
4 it's not. I did my own due diligence.

5 Just because Chris Krebs said don't believe
6 it, obviously, he's got another agenda. There's
7 something hidden there. He's a uniparty Republican, as
8 far as I'm concerned.

9 Q. Mr. Lindell, I have just a couple follow-up
10 questions.

11 Were you aware that General Flynn was
12 deposed in this litigation?

13 A. That what?

14 Q. General Flynn was deposed in this litigation?

15 A. Yeah, I heard that.

16 Q. And were you aware that he took the Fifth
17 Amendment?

18 MR. KACHOUROFF: Objection, relevance.

19 A. I heard that, too.

20 Q. (BY MS. WRIGLEY) Okay. And then I want to ask
21 you a little bit more about 582, sir.

22 A. What's that?

23 Q. I'm going to ask you about 582.

24 Do you see where Mr. Krebs referred to a
25 previous post where he said, "Seeing #thisinfo that some

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1 isolated voting day issues are tied to some nefarious 02:55PM
2 election hacking and vote manipulation operation. Don't 02:55PM
3 fall for it and think twice before sharing. Check out 02:55PM
4 Rumor Control for more info on the security safeguards 02:55PM
5 built into election #protect2020"? Do you see that? 02:55PM

6 A. Yeah. 02:55PM

7 Q. Okay. And then do you see below that he's kind 02:55PM
8 of -- 02:55PM

9 A. Yeah. 02:55PM

10 Q. -- directing to a reality and rumor sheet here 02:55PM
11 post election? 02:55PM

12 A. Uh-huh. 02:55PM

13 Q. Do you see that? 02:55PM

14 A. Uh-huh. 02:55PM

15 Q. Did you ever, prior to February of 2021, go to 02:55PM
16 the CISA website to check out any information on Rumor 02:55PM
17 Control? 02:55PM

18 A. I talked to the people that were involved back 02:55PM
19 then. And like I said, General Flynn -- 02:55PM

20 Q. General Flynn, yes, the generals. 02:55PM

21 A. -- yeah, General McInerney worked there. 02:55PM

22 Q. Yeah. I'm sorry. Did they work at CISA? 02:55PM

23 A. Colonel Waldron. 02:56PM

24 CISA, the only thing I heard about CISA is 02:56PM
25 that they were hiding this case down in Georgia. 02:56PM

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1 This -- they were stopping this case from getting 02:56PM
2 public, this Halderman case, the Curling case, which 02:56PM
3 involved Dominion. They held it for three and a half 02:56PM
4 years. 02:56PM

5 I also know CISA went to the State of South 02:56PM
6 Dakota and used my name there, saying, now, don't listen 02:56PM
7 to Mike Lindell. Why would they do that? Why is 02:56PM
8 anybody concerned with me about Hammer Scorecard? I 02:56PM
9 never told anybody on January 9th I had Hammer 02:56PM
10 Scorecard. 02:56PM

11 So anyway, you know, it was kind of crazy, 02:56PM
12 because media outlets like CNN are coming to me, you 02:56PM
13 know, Dennis Montgomery is a fraud. Well, I never said 02:56PM
14 I got it from Dennis Montgomery. So this is very 02:56PM
15 strange you're asking me these questions. 02:56PM

16 Q. Mr. Lindell, can I ask you about that Georgia 02:56PM
17 lawsuit that you mentioned that CISA held back? Where 02:56PM
18 did you get that information from in connection with the 02:56PM
19 lawsuit being held back in your claim that -- 02:56PM

20 A. From the Louisiana Secretary of State. 02:56PM

21 Q. What's that person's name? 02:56PM

22 A. Kyle Ardoin. 02:56PM

23 Q. And -- 02:56PM

24 A. And Kyle Ardoin was trying to get it from them 02:56PM
25 because they were warned not to use machines, not to use 02:57PM

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1 those machines.

02:57PM

2 Q. And this person told you that CISA was doing
3 something nefarious to hold up a lawsuit about an
4 election --

02:57PM

02:57PM

02:57PM

5 A. Either them or the judge. Who knows.

02:57PM

6 Q. Okay. Or the judge was involved with something
7 nefarious?

02:57PM

02:57PM

8 A. They would -- they couldn't get it. He wanted
9 to get it for the State of Louisiana. I'm working with
10 these secretary of states. I'm getting it right from a
11 government official, you know.

02:57PM

02:57PM

02:57PM

02:57PM

12 I'm a guy who -- before this all happened,
13 I'm just a guy that had a pillow company, United States,
14 American dream, and I'm dealing with all these
15 officials, and they're telling me this stuff. I'm
16 sorry. I believe generals, I believe colonels, I
17 believe cyber experts. I believe lawyers, some of them.

02:57PM

02:57PM

02:57PM

02:57PM

02:57PM

02:57PM

18 Q. I'm just going to mark Exhibit 424 [sic].

02:57PM

19 (Exhibit 624 marked.)

02:57PM

20 Q. (BY MS. WRIGLEY) We'll do this one real quick,
21 sir.

02:57PM

02:57PM

22 A. Oh, the -- oh, my.

02:57PM

23 Q. Exhibit 424 [sic] was marked --

02:57PM

24 A. This is all your exhibits.

02:57PM

25 Q. -- as Exhibit 111 in the complaint. Do you see

02:58PM

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1 this as an AP article from December of 2020, sir?

02:58PM

2 A. Uh-huh.

02:58PM

3 Q. Do you see the title of this article is

02:58PM

4 "Disputing Trump, Barr says no widespread election
5 fraud"?

02:58PM

02:58PM

6 A. Yeah.

02:58PM

7 Q. Do you see that?

02:58PM

8 MS. WRIGLEY: It's Exhibit 624.

02:58PM

9 MR. KACHOUROFF: 624. You said 424. I

02:58PM

10 was --

02:58PM

11 MS. WRIGLEY: Oh, it was the other one.

02:58PM

12 Thank you. Sorry. I'm sorry. 624.

02:58PM

13 Q. (BY MS. WRIGLEY) Okay. Now, if you look at --

02:58PM

14 let me just read the first couple paragraphs of this,
15 Mr. Lindell.

02:58PM

02:58PM

16 A. Yeah.

02:58PM

17 Q. It says, "Disputing President Donald Trump's

02:58PM

18 persistent, baseless claims, Attorney General William

02:58PM

19 Barr declared Tuesday the U.S. Justice Department has

02:58PM

20 uncovered no evidence of widespread fraud" -- "voter

02:58PM

21 fraud that could change the outcome of the 2020

02:58PM

22 election. Barr's comments in an interview with The

02:58PM

23 Associated Press contradict the concentrated [sic]

02:58PM

24 effort by Trump, his boss, to subvert the results of

02:58PM

25 last month's voting and block President-elect Joe Biden

02:58PM

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1 from taking his place in the White House. Barr told the 02:58PM
2 AP that U.S. attorneys and FBI agents have been working 02:59PM
3 to follow up specific complaints and information they've 02:59PM
4 received, but to date, we have not seen fraud on a scale 02:59PM
5 that could have effected a different outcome in the 02:59PM
6 election." Do you see that? 02:59PM

7 A. Uh-huh. 02:59PM

8 Q. Now, you were aware at the end of 2020 that 02:59PM
9 Bill Barr had publicly stated there was no widespread 02:59PM
10 fraud in the 2020 election, correct? 02:59PM

11 A. Yes. But I will say -- I will do an add-on 02:59PM
12 there. But then we also -- I personally had gotten a -- 02:59PM
13 wind of, in an E-mail that he sent to a state 02:59PM
14 official -- I think it was the Secretary of State in 02:59PM
15 Pennsylvania -- stand down. Do not investigate any 02:59PM
16 election fraud. That was right from Bill Barr. So I -- 02:59PM
17 Bill Barr lost all credibility with me when he sent that 02:59PM
18 out. 02:59PM

19 Also, I tried to get to Bill Barr, and he 02:59PM
20 would not -- it was a complete shutout. I tried to get 02:59PM
21 to Bill Barr because I had questions, going all these 02:59PM
22 people that are voting that don't live in those states, 02:59PM
23 and I didn't the question an answer. 02:59PM

24 Q. Why would Bill Barr do such a thing, 02:59PM
25 Mr. Lindell? Why would he -- 03:00PM

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1 A. You know what --

03:00PM

2 Q. -- having worked and been appointed by
3 President Trump would --

03:00PM

4 A. That's a deviation. It's like --

5 THE COURT REPORTER: I can only take one at
6 a time.

7 THE WITNESS: Okay.

8 Q. (BY MS. WRIGLEY) -- reject claims of
9 widespread fraud? Why would he do that, sir?

03:00PM

03:00PM

10 A. Well, that's called a deviation. It's like
11 when crooked Brad Raffensperger in Georgia -- when
12 people do things that you can't explain, like Doug Ducey
13 in Arizona, when he turned in the electors before the
14 11 hours of tape by Rudy Giuliani came out. He turns
15 it. You go why?

03:00PM

03:00PM

03:00PM

03:00PM

03:00PM

03:00PM

16 When things are unexplainable, there's a
17 hidden agenda. I don't know what that addenda is. I
18 don't know why Bill Barr did not want to investigate it.
19 I don't know. And I don't know why he came out --

03:00PM

03:00PM

03:00PM

03:00PM

20 It's a very broad statement, there's not
21 enough to overturn the election. You only half looked
22 in -- if you found some, why didn't you finish looking
23 into it, Bill? Because he did not complete it, and we
24 have an E-mail to prove that. He said stand down. Do
25 not investigate any more. I don't know why.

03:00PM

03:00PM

03:00PM

03:00PM

03:00PM

03:00PM

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1 That's called a deviation in behavior, and 03:00PM
2 I don't know why. I'd have to talk to Bill and say, 03:01PM
3 Bill, what was your reasoning for doing such a thing, 03:01PM
4 stopping an investigation into this country? 03:01PM
5 Q. Have you investigated Bill Barr, sir? 03:01PM
6 A. No. 03:01PM
7 Q. What's this E- -- 03:01PM
8 MR. KACHOUROFF: The attorneys have. 03:01PM
9 A. Uh-huh. 03:01PM
10 Q. (BY MS. WRIGLEY) What's this E-mail that 03:01PM
11 you're referring to, sir? 03:01PM
12 A. It's a -- it's -- that's public. You can 03:01PM
13 probably find that on the Internet. He sent an E-mail 03:01PM
14 to officials, I think it was the Secretary of State, in 03:01PM
15 the State of Pennsylvania. Stand down. Do not 03:01PM
16 investigate any more into this election. 03:01PM
17 Q. And what's the date of that? 03:01PM
18 A. It was in December of 2020. 03:01PM
19 Q. And how did you find out about that E-mail? 03:01PM
20 A. That was public. It was public. 03:01PM
21 Q. Okay. And -- 03:01PM
22 A. It was public. Somebody got -- 03:01PM
23 Q. -- based on that E-mail -- 03:01PM
24 A. Somebody got it to me, and I'm going, you know 03:01PM
25 what? And I'm going, Bill, if you only knew what I had 03:01PM

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1 here. I was finding all these states where the people
2 voted that didn't live there. And that's what I wanted
3 to get to. Yeah.

4 Q. And because of that E-mail, you're completely
5 disregarding any credibility that Bill Barr had --

6 A. It didn't make sense -- it didn't make sense
7 why Bill Barr would not check into that or why he
8 wouldn't check into when he knew those 106,000 votes in
9 Michigan, they weren't counted on the -- they weren't
10 mail-in votes. They were counted on the morning of the
11 3rd. He --

12 Q. Would it make sense if there was no widespread
13 fraud, sir?

14 A. What's that?

15 Q. Would it make sense if there was, in fact, no
16 widespread fraud in the election?

17 A. When you --

18 Q. It would make sense, right?

19 A. No, it wouldn't make sense when you have the
20 deviations that happened on the morning of the 4th.

21 Let me tell you this: If we'd have all
22 went to bed on the morning of the 4th and the algorithms
23 hadn't been broke, where they had shut down five states
24 at the same time, an order, shut them down. They shut
25 them down. Every one had a different excuse.

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1 Arizona, it took ten days to count. That's
2 1 percent. I had done the mathematics. It's impossible
3 that they did not come back where Donald Trump didn't
4 win by 70,000 votes. Those are mathematics.

5 So it was pretty -- in my mind, it was
6 absolutely impossible based on those deviations. Dig
7 into the deviations and find the truth, then tell me
8 there was no widespread fraud. But nobody did that.

9 This -- I'm telling you right now, probably
10 the first time you ever heard that those 106,000 votes
11 in the middle of the night that went like this
12 (gesturing) for Michigan, those were not mail-in votes
13 like they told us. The media lied to us. They were --
14 the -- they were counted on the morning of the 3rd. So
15 I'd like to know why. Give me an answer.

16 MS. WRIGLEY: Move to strike as
17 nonresponsive.

18 Q. (BY MS. WRIGLEY) I've handed to you what's
19 been marked as Exhibit 625, sir.

20 (Exhibit 625 marked.)

21 Q. (BY MS. WRIGLEY) This was marked as Exhibit 72
22 to the complaint. It's a printout from Dominion's
23 website. It was updated on November 17th, 2020.

24 If you can turn to the second page, do you
25 see that the title of this section from the website is

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1	"Setting the record straight: Facts and rumors.	03:03PM
2	Dominion voting systems categorically denies false	03:03PM
3	assertions about vote switching and software issues with	03:03PM
4	our voting systems"? Do you see that?	03:03PM
5	A. Uh-huh.	03:03PM
6	Q. And then do you see underneath of there it	03:03PM
7	says, "According to a joint statement by the Federal	03:03PM
8	Government agency that oversees U.S. election security,	03:03PM
9	the Department of Homeland Security's Cybersecurity &	03:03PM
10	Infrastructure Security Agency, CISA, 'There is no	03:03PM
11	evidence that any voting system deleted or lost votes,	03:03PM
12	changed votes or was in any way compromised.' The	03:04PM
13	government and private sector councils that support this	03:04PM
14	mission called the 2020 election 'the most secure in	03:04PM
15	American history.'" Do you see that?	03:04PM
16	A. And you believe that?	03:04PM
17	Q. Sir --	03:04PM
18	A. Because Chris Krebs said that, right?	03:04PM
19	Q. Let me --	03:04PM
20	A. Who got fired.	03:04PM
21	Q. Let me ask you a question. Were you familiar	03:04PM
22	that CISA had issued a statement such as this --	03:04PM
23	A. No.	03:04PM
24	Q. -- that's reflected in Dominion's website?	03:04PM
25	A. No.	03:04PM

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1 Q. Are -- did you know at the end of 2020 that 03:04PM
2 Dominion had a section on its websites -- 03:04PM

3 A. No. 03:04PM

4 Q. -- addressing facts and rumors? 03:04PM

5 A. No. 03:04PM

6 Q. Okay. Let me ask you this: Prior to February 03:04PM
7 5th, 2021, did you visit the website of Dominion? 03:04PM

8 A. No. 03:04PM

9 Q. Prior to February 5th, 2021, did you visit the 03:04PM
10 website of Smartmatic? 03:04PM

11 A. No. 03:04PM

12 Q. Prior to February 5th, 2021, did you visit the 03:04PM
13 website of ES&S? 03:04PM

14 A. No. 03:04PM

15 Q. Prior to February 5th, 2021, did you visit the 03:04PM
16 website of Hart InterCivic? 03:04PM

17 A. No. 03:04PM

18 Q. Prior to February 5th, 2021, did you visit the 03:04PM
19 website of any voting company? 03:05PM

20 A. No. 03:05PM

21 Q. And so you didn't look at the websites of 03:05PM
22 either Smartmatic or Dominion and try to investigate 03:05PM
23 election fraud before you put out Absolute Proof? 03:05PM

24 A. No. I -- they're not going to put it on their 03:05PM
25 website. Hey, I will tell you what I did do. I'm going 03:05PM

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1 to bring this up right now, and I'll talk slow. 03:05PM

2 I was in Georgia. I'm going to tell you 03:05PM
3 where I'm coming from. I was in Georgia -- 03:05PM

4 MS. WRIGLEY: Sir, I'm just going to 03:05PM
5 object. There's no -- there's no question pending -- 03:05PM

6 A. Well, I'm going to tell you something. I was 03:05PM
7 in Georgia -- 03:05PM

8 MS. WRIGLEY: -- it's nonresponsive and 03:05PM
9 it's wasting the time. 03:05PM

10 A. I'm going to say I was in Georgia on 03:05PM
11 January 4th at the -- where the two senators were going 03:05PM
12 to be in the runoff. I sat and got on my knees and 03:05PM
13 prayed that they would steal both of them. And why 03:05PM
14 would I do that? You know why? Because if they would 03:05PM
15 have just said give them back a Republican so they shut 03:05PM
16 up about this election, I knew right then if they took 03:05PM
17 them both that the public would go, you know, hey, we've 03:05PM
18 got to look into these problems. We've got to look into 03:05PM
19 these computers and machines. And my prayers were 03:05PM
20 answered. So here we are. 03:05PM

21 Q. (BY MS. WRIGLEY) Sir, does MyPillow have a 03:06PM
22 website? 03:06PM

23 A. What's that? 03:06PM

24 Q. Does MyPillow have a website? 03:06PM

25 A. I don't know if you bought any pillows, but it 03:06PM

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1 helped us. Yes.

03:06PM

2 Q. And do you put information about the company on
3 that website, sir?

03:06PM

03:06PM

4 A. If I was a corrupt company, I certainly
5 wouldn't put anything out there.

03:06PM

03:06PM

6 Q. How would anybody know whether MyPillow is a
7 corrupt company, sir?

03:06PM

03:06PM

8 A. Why would I look at Dominion's website if it
9 was going to be something up -- look, if I was a private
10 eye, I'd be doing -- which I've hired many private eyes
11 in this investigation.

03:06PM

03:06PM

03:06PM

03:06PM

12 Q. What are the names of the private eyes you've
13 hired to investigate Smartmatic?

03:06PM

03:06PM

14 A. I'd -- you'd have to get that from my
15 attorneys. We hired a whole -- one whole team, that was
16 a quarter million. We hired another one. That Brent
17 guy we didn't hire, but he was -- that's what he does.
18 I don't -- he was never paid, said I want to do it for
19 free. But there was a company that was hired, \$200,000.

03:06PM

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20 Q. Sir, if you look at the second page of this --
21 can I have you flip into the exhibit, please. It's 625.
22 Do you see that there's a section number 2, "Assertions
23 of super computer election fraud conspiracies are 100
24 percent false"? Do you see that?

03:07PM

03:07PM

03:07PM

03:07PM

03:07PM

25 A. They put that in Smartmatic's website?

03:07PM

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1 Q. This is on Dominion's website, sir. But you've 03:07PM
2 never seen it, right? 03:07PM

3 A. No. 03:07PM

4 Q. Okay. And do you see where it says, "The 03:07PM
5 Cybersecurity & Infrastructure Security Agency, CISA, 03:07PM
6 has debunked claims about the existence of a secret CIA 03:07PM
7 program for voter fraud called Hammer and Scorecard." 03:07PM
8 Do you see that? 03:07PM

9 A. Uh-huh. 03:07PM

10 Q. And it's got some bullet points -- 03:07PM

11 A. Uh-huh. 03:07PM

12 Q. -- describing this -- 03:07PM

13 A. Uh-huh. 03:07PM

14 Q. -- voting systems in the United States. Do you 03:07PM
15 see that? 03:07PM

16 A. Yeah. 03:07PM

17 Q. The first one says, "All U.S. voting systems 03:07PM
18 must provide assurance that they work accurately and 03:07PM
19 reliably as intended under Federal U.S. EAC and date 03:07PM
20 certifications and testing requirements. Election 03:07PM
21 safeguards from testing and certification of voting 03:07PM
22 systems to canvassing and auditing prevent malicious 03:07PM
23 actors from tampering with vote counts and ensure final 03:08PM
24 vote tallies are accurate. Read more from CISA." Do 03:08PM
25 you see that, sir? 03:08PM

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1 A. Uh-huh.

03:08PM

2 Q. Are you familiar that there are certification
3 requirements for voting systems --

03:08PM

03:08PM

4 A. Yep.

03:08PM

5 Q. -- in the United States?

03:08PM

6 A. I certainly do, because I've spearheaded
7 lawsuits against machine companies, Dominion -- i.e.,
8 Dominion in both Arizona, then I was going state by
9 state. Arizona, we're still in like the fourth appeal.

03:08PM

03:08PM

03:08PM

03:08PM

10 They weren't certified. They're not
11 certified. They were illegal. That's what the Georgia
12 case says in Georgia. Very similar to the Curling case,
13 the cases I have, the lawsuits I have out there against
14 these machine companies. Not yours. This was in
15 Arizona, Alabama, and I was going to go state by state.

03:08PM

03:08PM

03:08PM

03:08PM

03:08PM

03:08PM

16 They're not certified. They lied. They
17 lied. They're all online, and they lied and lied. So
18 they broke the -- you could almost take any -- if you're
19 talking about Dominion now, not yourself, I can say this
20 about Dominion. They are not certified. They break
21 laws in most of the counties -- or most -- I mean, most
22 of the states.

03:08PM

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03:08PM

23 Louisiana is their longest running partner,
24 and they're out of date, they're out of certification.
25 They weren't certified. There's so many laws that they

03:08PM

03:09PM

03:09PM

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1 broke. They probably broke more laws by accident than
2 you guys did on purpose.

3 MS. WRIGLEY: I'm going to strike that as
4 nonresponsive.

5 Q. (BY MS. WRIGLEY) This is Exhibit 626, sir.

6 (Exhibit 626 marked.)

7 Q. (BY MS. WRIGLEY) This is a printout from
8 Smartmatic's website. It is marked as Exhibit 66 to the
9 complaint.

10 Do you see, if you look to the first page,
11 that it says, "Smartmatic fact checked"? Do you see
12 that?

13 A. Uh-huh. Did you guys write this?

14 Q. This was information from the website. Have --
15 have you ever been to Smartmatic's website, sir?

16 A. No. No.

17 Q. No.

18 A. I can write nice things about you, too, if I
19 want. Can I write some of your facts on there?

20 Q. No. There's a number of companies that have
21 websites on the Internet, correct?

22 A. Yeah.

23 Q. And MyPillow has a website, correct?

24 A. That's right.

25 Q. And there's information about MyPillow,

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1 correct?

03:09PM

2 A. (Witness indicated by nodding his head
3 affirmatively.)

03:09PM

03:09PM

4 Q. NewsMax has a website, correct?

03:09PM

5 A. Yeah.

03:09PM

6 Q. And there's information about NewsMax on its
7 website, correct?

03:09PM

03:10PM

8 A. Uh-huh. Yeah.

03:10PM

9 Q. Now, I don't know. Let's say Pfizer, the
10 pharmaceutical company, are you familiar with Pfizer?
11 It has a website, correct?

03:10PM

03:10PM

03:10PM

12 A. Uh-huh.

03:10PM

13 Q. And it puts out information about itself on the
14 website, correct?

03:10PM

03:10PM

15 A. Uh-huh.

03:10PM

16 Q. And so how does anybody know if information on
17 a website's correct or not, sir?

03:10PM

03:10PM

18 A. You do your own due diligence like I did.

03:10PM

19 Q. Okay. But one basic step would be to go to a
20 company's website and look for --

03:10PM

03:10PM

21 A. No.

03:10PM

22 Q. -- information about it?

03:10PM

23 No?

03:10PM

24 A. No. I would go -- if I want to investigate a
25 company -- I haven't been to Fox News's website, but I

03:10PM

03:10PM

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1 investigated them. I don't go -- I'm not going to go to
2 a website and read their fluff.

3 Q. Okay. And so whatever you put on the website
4 for MyPillow, nobody should trust that information,
5 correct?

6 A. No. That's not what I said. If I was under
7 investigation that I did something, you would go around,
8 you would go investigate the company. Have you guys
9 been to my website? You think I'm going to -- from
10 MyPillow, you're going to buy pillows there. That's
11 what you do.

12 What -- I didn't even know if Smart- -- to
13 be honest with you, I didn't even know Smartmatic had a
14 website. What, to sell your machines to someone?
15 There's a -- why would Smartmatic have a website if
16 you're selling machines to our government? That doesn't
17 make sense.

18 Q. Mr. Lindell -- Mr. Lindell, let me ask you
19 this: You're familiar when corporations get
20 incorporated, they have to do filings in this country,
21 correct?

22 A. Yeah.

23 Q. Okay. And your company has corporate filings,
24 right?

25 A. Right.

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1 Q. And those are public records, right? 03:11PM

2 A. Right. 03:11PM

3 Q. Have you done any public record searches for 03:11PM
4 Smartmatic in terms of any incorporation papers? 03:11PM

5 A. My -- yes. My -- but not me personally. I 03:11PM
6 have private eyes. 03:11PM

7 Q. Did you do it before "Absolute Proof," sir? 03:11PM

8 A. I don't know. I don't know when the one guy 03:11PM
9 started. I know that they -- I know one of them did for 03:11PM
10 sure. There was one involved for sure, but it wasn't 03:11PM
11 one of the private eye companies. 03:11PM

12 Q. What -- I'm sorry, what are the private eye 03:11PM
13 companies that you've hired, sir? What are their names? 03:11PM

14 A. I don't know their names. You would have to 03:11PM
15 get the -- Curt has that. 03:11PM

16 Q. Okay. But you've hired, in connection with 03:11PM
17 your documentaries, private investigators to -- 03:11PM

18 A. No, it wasn't the docu -- 03:11PM

19 Q. -- identify information for those things? 03:11PM

20 A. A documentary is to get the word out. This was 03:11PM
21 an ongoing investigation into machine companies and to 03:11PM
22 get rid of them. 03:12PM

23 Q. Okay. 03:12PM

24 A. That's what it was. 03:12PM

25 Q. Is there any information that you've obtained 03:12PM

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1 from private investigators you've hired to look into 03:12PM
2 Smartmatic that you've relied upon in publishing your 03:12PM
3 documentary movies? 03:12PM

4 A. Absolutely. 03:12PM

5 Q. And what -- 03:12PM

6 A. And not the documentary -- 03:12PM

7 Q. -- are those private investigators' names? 03:12PM

8 A. I don't know. 03:12PM

9 Q. You don't know, do you? 03:12PM

10 A. No. No, those were cyber guys. Okay? Cyber 03:12PM
11 guys and a general -- two generals and a colonel. 03:12PM

12 And by the way, all that's put into a 03:12PM
13 library at Cause of America. All this stuff is sitting 03:12PM
14 there in Cause of America, and evidence against y'all is 03:12PM
15 at FrankSpeech. Hit the button inside the machines. I 03:12PM
16 posted it all. It's very public. 03:12PM

17 Have you looked at my website to do your 03:12PM
18 due diligence? I put all the evidence right there. You 03:12PM
19 should look at FrankSpeech website. 03:12PM

20 Q. I -- 03:12PM

21 A. Everything against you is right there. 03:12PM

22 Q. We've looked a lot at FrankSpeech, sir. 03:12PM

23 A. I'm sorry. 03:12PM

24 Q. We're probably one of your top viewers on 03:12PM
25 FrankSpeech. 03:12PM

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1	A. I'm sorry. Yeah. I mean --	03:12PM
2	Q. Okay? Lindell TV, FrankSpeech, MyPillow.	03:12PM
3	A. I mean, but I put up --	03:12PM
4	Q. I printed the entire website up there.	03:12PM
5	A. Right. That's why I put -- right.	03:12PM
6	Q. So you've got fans.	03:12PM
7	A. Okay. But I --	03:12PM
8	Q. So can we leave that now and let me get to the	03:12PM
9	questions?	03:13PM
10	A. Yeah. Okay. I'm just saying that the	03:13PM
11	investigator then -- the investigation -- I relied more	03:13PM
12	on people that were there, General Flynn, General	03:13PM
13	McInerney, which I hope you talk to him. They were	03:13PM
14	there. They were there with Hammer Scorecard. They	03:13PM
15	were there. They validated.	03:13PM
16	It's all real. Dennis's stuff is real.	03:13PM
17	I'd seen -- I just had General Flynn with them not even	03:13PM
18	three months ago. It was like two people talking	03:13PM
19	like --	03:13PM
20	Q. Mr. Lindell --	03:13PM
21	MR. KACHOUROFF: Let her ask the question.	03:13PM
22	THE WITNESS: Right. Yeah.	03:13PM
23	Q. (BY MS. WRIGLEY) Let me ask you about the	03:13PM
24	generals. When you say the general, you're referring to	03:13PM
25	General McInerney and Michael Flynn, correct?	03:13PM

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1 A. And Colonel Waldron.

03:13PM

2 Q. And Colonel Waldron.

03:13PM

3 A. I've never met these guys before, and they're
4 saying it's all real. It's hundred percent, Mike. What
5 you've got is real.

03:13PM

03:13PM

03:13PM

6 Q. And --

03:13PM

7 A. Hundred percent true.

03:13PM

8 Q. -- what official role did General Michael Flynn
9 have in connection with anything having to do with the
10 2020 presidential election?

03:13PM

03:13PM

03:13PM

11 A. He was -- he was the -- in charge back when
12 Hammer Scorecard was -- back -- back when Hammer
13 Scorecard was developed. You've got to go back with
14 Brennan and Clapper. I'm sure you heard all this from
15 Mary Fanning if you talked to her.

03:13PM

03:13PM

03:14PM

03:14PM

03:14PM

16 But back then, Flynn was a -- I think he
17 was a Democrat or whatever. I think so, but I don't
18 know, under Obama or maybe Bush. I don't even remember
19 that part because I wasn't into politics. I was smoking
20 crack back then.

03:14PM

03:14PM

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03:14PM

21 Q. Mr. Lindell, I'm talking about the 2020
22 election. What role did General Michael Flynn have in
23 connection with the 2020 election? What role?

03:14PM

03:14PM

03:14PM

24 A. What role? Yeah, probably nothing as far as
25 the 2020 election.

03:14PM

03:14PM

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1 Q. Let me ask you about General McInerney. Did
2 General McInerney have any role in connection with the
3 2020 presidential election?

4 A. You know what? I guess they both did, because
5 they both have -- can validate the evidence that I had,
6 and so that's directly involved with the 2020 election.

7 Q. But they had no official role, correct, sir?

8 A. No. They could just validate the evidence that
9 I got on January 9th.

10 Q. They're not being asked by any government
11 agencies to do anything in connection with the 2020
12 election, either General McInerney or General Michael
13 Flynn, correct?

14 A. No, I don't believe so. Maybe Colonel Waldron
15 was, though.

16 Q. Now, did Colonel Waldron have an official role
17 in connection with the 2020 --

18 A. I think he might have.

19 Q. What was the role?

20 A. I don't know. I don't know, but he -- I
21 believe he still works for the government, and I believe
22 it's cyber. It has to do with the United States
23 security, so I believe he still works for the
24 government.

25 Q. So let me just make sure the record's clear.

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1 With respect to General Phil Waldron, you don't know
2 what he --

3 A. It's Colonel Waldron.

4 Q. Colonel Waldron. You don't know --

5 A. Oh, I'm sure they -- I believe he still worked
6 for the government. When I met him, he was, and I think
7 he's deep into the cyber -- that world.

8 Q. Did he have a role in connection with the 2020
9 presidential election?

10 A. I believe he did. I don't know -- I can't say
11 a hundred percent for sure, but I believe he did.

12 Q. So going back to --

13 A. As far as security, like a -- you know, I mean,
14 security to make sure to try and --

15 Q. Going back to Exhibit 626 that's in front of
16 you, which is a printout from Smartmatic's website, just
17 to be clear, this is never any information that you
18 consulted prior to putting out your "Absolute Proof"
19 documentary series?

20 A. Say that again.

21 Q. Going back to 626, which is a printout from the
22 Smartmatic website, to be clear, none of this is
23 information you consulted prior to putting out your
24 "Absolute Proof" --

25 A. I never went to Smart- --

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1 Q. -- documentary series?

03:16PM

2 A. I never went to Smartmatic's website. Didn't
3 know they had one. If I look for a manufacturer, I
4 can't find their websites.

03:16PM

03:16PM

03:16PM

5 Q. And were you aware prior to February 5th, 2021
6 whether ES&S had put out information on the website
7 about whether voting machines could be hacked?

03:16PM

03:16PM

03:16PM

8 A. No.

03:16PM

9 Q. You never went to the ES&S website?

03:16PM

10 A. No.

03:16PM

11 Q. Okay. Now let me focus on Dominion. Before
12 the end of 2020, did you receive any letters or
13 correspondence from attorneys for Dominion related to
14 claims that you were making about the company and its
15 voting machines?

03:16PM

03:16PM

03:16PM

03:16PM

03:16PM

16 A. I don't believe. I think it was the end of
17 January.

03:16PM

03:16PM

18 Q. Okay. I'm going to hand you --

03:16PM

19 A. Could be the end of December, could have been
20 January, but I know I didn't see it until probably
21 January.

03:17PM

03:17PM

03:17PM

22 Q. I'm going to hand you an exhibit. This is 627,
23 sir.

03:17PM

03:17PM

24 (Exhibit 627 marked.)

03:17PM

25 A. Yeah. That's December, yeah.

03:17PM

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1 Q. (BY MS. WRIGLEY) Okay. Do you see, looking at 03:17PM
2 the first page -- and this is Bates stamped DEF 001068, 03:17PM
3 and it has an attachment, which was 1069, and the 03:17PM
4 attachment has three pages. Do you see this is an 03:17PM
5 E-mail from somebody at Clare Locke to yourself on 03:17PM
6 December 23rd, 2020? 03:17PM

7 A. I don't know if I've ever read this one. 03:17PM

8 Q. Okay. Looking at the top, do you see it's an 03:17PM
9 E-mail to you, sir? 03:17PM

10 A. It says it's E-mailed to me, correct. 03:17PM

11 Q. The subject is "Notice of" -- 03:17PM

12 A. That's an E-mail that I rarely use. I don't 03:17PM
13 know -- I don't ever remember reading this here, this 03:17PM
14 particular letter. 03:17PM

15 Q. Well, so let me ask you about the subject here. 03:17PM

16 A. Okay. 03:17PM

17 Q. We'll walk through it, sir. 03:18PM

18 The subject is "Notice of obligation to 03:18PM
19 preserve documents related to Dominion." Do you see 03:18PM
20 that? 03:18PM

21 A. Yeah. 03:18PM

22 Q. It's on the first page. 03:18PM

23 And on the E-mail it says, "Mr. Lindell, 03:18PM
24 please see the attached correspondence from Tom Clare 03:18PM
25 and Megan Meier, and kindly confirm receipt." Do you 03:18PM

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1 see that? It's on the first page on the E-mail.

03:18PM

2 A. Yeah.

03:18PM

3 Q. Now, if you go to the attachment, do you see
4 that this is a letter from the law firm Clare Locke
5 addressed to yourself? Do you see that, sir?

03:18PM

03:18PM

03:18PM

6 A. Yeah.

03:18PM

7 Q. The first paragraph states, "Our law firm is
8 defamation counsel to U.S. Dominion, Inc. We write
9 regarding your patently false accusations that Dominion
10 has somehow rigged or otherwise improperly influenced
11 the U.S. presidential election. Despite knowing your
12 implausible attacks against Dominion have no basis, in
13 reality, you have participated in the vast and
14 concentrated misinformation campaign to slander
15 Dominion." Do you see that?

03:18PM

03:18PM

03:18PM

03:18PM

03:18PM

03:18PM

03:18PM

03:18PM

03:18PM

16 A. Uh-huh.

03:18PM

17 Q. And do you recall in December of 2020, counsel
18 for Dominion writing to you about your participating in
19 a misinformation campaign to slander the company?

03:18PM

03:19PM

03:19PM

20 A. Okay.

03:19PM

21 Q. Do you recall their lawyers informing you of
22 this?

03:19PM

03:19PM

23 A. I -- I don't know if I read this back then, but
24 it looks -- yeah, I probably did.

03:19PM

03:19PM

25 Q. Okay.

03:19PM

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1 A. So...

03:19PM

2 Q. Now, if you look at the second paragraph, it
3 says, "Last --

03:19PM

03:19PM

4 A. To be honest with you, I think I didn't read
5 this till January.

03:19PM

03:19PM

6 Q. You might have read it in January of 2021?

03:19PM

7 A. Yeah, that's when I read it. I know I didn't
8 read it in December, even though it says December,
9 because I --

03:19PM

03:19PM

03:19PM

10 Q. Now --

03:19PM

11 A. -- think I went back and searched Dominion in
12 my E-mail and said that's an E-mail I rarely ever used,
13 that M Lindell.

03:19PM

03:19PM

03:19PM

14 Q. The second paragraph states, sir, "Last week,
15 we sent letters to Sidney Powell and various media
16 entities demanding retraction of their myriad false and
17 conspiratorial claims about Dominion."

03:19PM

03:19PM

03:19PM

03:19PM

18 A. Uh-huh.

03:19PM

19 Q. "Recently, you have positioned yourself as a
20 prominent leader of the ongoing misinformation campaign.
21 Accordingly, Dominion formally demands that you, 1,
22 cease and desist making defamatory claims against
23 Dominion; and 2, preserve and retain all documents
24 relating to Dominion and your smear campaign against the
25 company."

03:19PM

03:19PM

03:19PM

03:20PM

03:20PM

03:20PM

03:20PM

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1 A. Uh-huh.

03:20PM

2 Q. Do you see that?

03:20PM

3 A. Yep.

03:20PM

4 Q. Do you recall being told by Dominion or being
5 demanded -- Dominion demanding that you cease and desist
6 making defamatory claims about the company?

03:20PM

03:20PM

03:20PM

7 A. Yeah, but I didn't make any defamatory claims.
8 I made -- my stuff was all true. I did my own
9 investigation.

03:20PM

03:20PM

03:20PM

10 Q. So you would have been --

03:20PM

11 A. I never made a defamatory claim. That's --
12 what you just said there, do you recall that, it's the
13 way you're saying that is wrong. Do I recall them
14 saying not to say defamatory? I listened to them very,
15 very truthfully, very carefully. So I only said the
16 truth, just like I do about Smartmatic.

03:20PM

03:20PM

03:20PM

03:20PM

03:20PM

03:20PM

17 Q. Now, after receiving and reviewing this letter,
18 which you said was probably in January 2021, you
19 continued to make claims about Dominion being involved
20 in rigging the 2020 election, correct?

03:20PM

03:20PM

03:20PM

03:20PM

21 A. Especially after January 9th, correct. Once I
22 could confirm all the evidence I had that this -- that
23 it did come from the -- I was 95 percent sure, because
24 there's no way to explain millions of people voting in
25 all these states that don't live there. You can't even

03:20PM

03:20PM

03:21PM

03:21PM

03:21PM

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1 explain that. Nobody can. How can you have -- every
2 state in every county in the United States have people
3 that voted and that didn't vote in that county that
4 don't live there? It's impossible.

5 So when -- on January 9th, it was all
6 confirmed to me, and I never shut up. I never will.

7 Q. So --

8 A. I can't. I can't or we lose our country.

9 Q. So, Mr. Lindell, even after receiving a letter
10 like this from Dominion's lawyers warning and about
11 litigation being imminent --

12 A. It's like racketeering.

13 Q. Hold on.

14 A. Are you kidding me?

15 Q. Hold on. You continued to make claims about
16 Dominion, correct?

17 A. Yeah. This is like racketeering, except you
18 don't succeed --

19 Q. Nothing -- nothing would stop you, right?

20 A. No, not knowing what I know, absolutely.

21 Q. Okay.

22 A. Knowing what I know, my own due diligence, not
23 by what Sidney Powell said or Rudy Giuliani said or all
24 these other deviations, what I found myself, with the
25 due diligence I did, I will never, ever stop. You could

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1 put a lie detector. I'm a hundred percent right, and I
2 will never back down from that ever. We lose our
3 country.

4 Q. And, Mr. Lindell, as you sit here today, it's
5 your testimony that you will never stop making claims
6 that Smartmatic was involved in rigging the 2020
7 election?

8 A. I will never stop making claims that we need to
9 get rid of these voting machines, including your brand,
10 in our country. Just like all the Democrats said the
11 same thing about y'all. Amy Klobuchar, Kamala Harris,
12 they all said that. The hundreds of Democrats in the
13 film, everyone said the same thing about you guys.

14 Q. So Mr. Lindell --

15 A. Everyone did.

16 Q. -- let me -- I want to make sure you hear my
17 question. As you sit here today, will you ever stop
18 making claims that Smartmatic was involved in rigging
19 the 2020 election?

20 A. I will never stop making claims that we need to
21 get rid of Smartmatic and every other brand of
22 computer used in our elections.

23 Q. That's -- that's not what I'm asking,
24 Mr. Lindell. I'm asking about claims that Smartmatic
25 rigged the 2020 election. Will you continue to

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1 make those claims?

03:22PM

2 MR. KACHOUROFF: Objection to form.

03:22PM

3 A. Yeah, I don't know -- I don't know what you're
4 asking there.

03:22PM

03:22PM

5 Q. (BY MS. WRIGLEY) Okay. Well, you had said we
6 need to get rid of the voting machines.

03:22PM

03:22PM

7 A. Absolutely, we do.

03:22PM

8 Q. That's different from rigging the election,
9 correct? Do you understand the distinction?

03:22PM

03:22PM

10 A. What's that?

03:23PM

11 Q. You said we need to get rid of the voting
12 machines.

03:23PM

03:23PM

13 A. We have to.

03:23PM

14 Q. Okay.

03:23PM

15 A. We have to.

03:23PM

16 Q. Now, that is different from saying Smartmatic's
17 voting machines rigged the 2020 election, correct?

03:23PM

03:23PM

18 A. Their -- they were definitely used to rig the
19 2020 election. Hundred percent.

03:23PM

03:23PM

20 Q. Okay. Now, are you going to continue to make
21 claims that Smartmatic rigged the 2020 election?

03:23PM

03:23PM

22 A. I have -- what I have said is we have to get
23 rid of them. There -- it could be any election. There
24 is no machine -- and they asked me once, Mike, do you
25 trust the 2016 election? No, because machines were

03:23PM

03:23PM

03:23PM

03:23PM

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1 used. I don't -- knowing what I know now, any election
2 that's ever used with computers, I don't care if it's in
3 the polling books, the border rolls or their -- I will
4 never trust an election in history that uses a computer.

5 Q. So I -- let me make just sure I'm clear,
6 because I'm not asking about getting rid of the voting
7 machines. I'm asking about your statement that the
8 Smartmatic voting machines were used to rig the 2020
9 election?

10 A. They were used -- absolutely used --

11 Q. But are you going to --

12 A. -- like any other voting machine companies
13 were. Absolutely. Hundred percent. The answer is yes.
14 Yes, they were used.

15 Q. You will continue -- will you continue to make
16 claims that Smartmatic rigged the 2020 election, sir?

17 MR. KACHOUROFF: Objection. That wasn't
18 his testimony. He answered the question several times
19 now.

20 THE WITNESS: Yeah. That's the --

21 MS. WRIGLEY: He's not answered it.

22 MR. KACHOUROFF: He did.

23 Q. (BY MS. WRIGLEY) Sir, will you continue to
24 make those claims?

25 MR. KACHOUROFF: He said voting machines

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1 are being used to rig the election.

2 A. Yes.

3 MS. WRIGLEY: That was not the answer. 03:24PM

4 That's nonresponsive. 03:24PM

5 A. I am going to continue to preach to get rid of 03:24PM
6 all machine companies in our -- in these elections. If 03:24PM
7 somebody asked me if Smartmatic was used -- if their 03:24PM
8 machines were used to rig the 2020 election, I will say 03:24PM
9 yes, until -- forever. You guys -- you can't change 03:24PM
10 history. You guy did it, and that you were part of it, 03:24PM
11 and that's it. 03:24PM

12 Q. (BY MS. WRIGLEY) I'm going to hand you 03:24PM
13 Exhibit 628, sir. 03:24PM

14 (Exhibit 628 marked.) 03:24PM

15 Q. (BY MS. WRIGLEY) 628 is DEF 000718 that has a 03:24PM
16 letter attached, which was produced as 719, and the 03:24PM
17 letter is four pages. 03:24PM

18 Sir, looking at 628, do you see in the 03:24PM
19 first page it's an E-mail chain that starts on 03:24PM
20 January 8th, 2021 and then goes to January 9th, 2021? 03:25PM
21 It's on the first page, sir. 03:25PM

22 A. (Witness peruses document.) 03:25PM

23 Q. Do you see this E-mail from January 2021? 03:25PM

24 A. Yes. Yes, I see it. Yeah. 03:25PM

25 Q. Okay. And this is a letter you received, 03:25PM

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1 another letter from Dominion's lawyers?

03:25PM

2 A. Yes.

03:25PM

3 Q. And the letter that's attached is dated
4 January 8, 2021, correct?

03:25PM

03:25PM

5 A. Yes.

03:26PM

6 Q. The subject is "Your false and defamatory
7 claims concerning Dominion." Do you see that?

03:26PM

03:26PM

8 A. The -- yes.

03:26PM

9 Q. First paragraph states, "We write again on
10 behalf of U.S. Dominion, Inc. to supplement our
11 December 22, 2020 demand for retraction."

03:26PM

03:26PM

12 A. Uh-huh.

03:26PM

13 Q. Do you see that?

03:26PM

14 A. Yep.

03:26PM

15 Q. Second paragraph. "In the past several weeks,
16 you have falsely accused Dominion of fraud and stealing
17 millions of votes. And on December 21st, 2020, you
18 appeared with Sebastian Gorka on Greg Kelly Reports to
19 peddle defamatory falsehoods about Dominion. When
20 discussing the outcome of the November 2020 election,
21 you made the demonstrably false claims that 'the biggest
22 fraud is the Dominion machines.'" Do you see that?

03:26PM

03:26PM

03:26PM

03:26PM

03:26PM

03:26PM

03:26PM

03:26PM

23 A. Uh-huh.

03:26PM

24 Q. And were you making accusations of Dominion
25 regarding election fraud in December of 2020?

03:26PM

03:26PM

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1	A. Yeah, because I -- if you read a little	03:26PM
2	further, it says, "All Dominion machines underwent	03:26PM
3	certification, logic and accuracy testing before the	03:27PM
4	election." They lied. They were not done in Arizona.	03:27PM
5	Q. Now, this was the second letter you received	03:27PM
6	from Dominion --	03:27PM
7	A. Uh-huh. That was full of lies, so...	03:27PM
8	Q. -- in January of 2021, correct?	03:27PM
9	A. Yep.	03:27PM
10	Q. Okay. And the letter identifies that you had	03:27PM
11	publicly accused Dominion of election fraud, correct?	03:27PM
12	A. That's correct.	03:27PM
13	Q. And it refers to you undertaking a smear	03:27PM
14	campaign, correct?	03:27PM
15	A. That's what they were saying.	03:27PM
16	Q. And in the letter, Dominion's lawyers informed	03:27PM
17	you that your campaign was inflicting damage to the	03:27PM
18	company's name and business operations, right?	03:27PM
19	A. Well, no. I didn't see that. Is that in here	03:27PM
20	somewhere? I didn't read this thing back then.	03:27PM
21	Q. And if you go to the second to last full	03:27PM
22	paragraph on Page 4 --	03:27PM
23	MR. KACHOUROFF: Why don't you read the	03:27PM
24	whole exhibit, Mr. Lindell.	03:27PM
25	THE WITNESS: Okay. Yeah.	03:27PM

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1 A. (Witness peruses document.) Hum, interesting. 03:28PM

2 They were upset, it says here that -- 03:28PM

3 MR. KACHOUROFF: Well, just read it, and 03:28PM
4 then she'll ask you questions about it. 03:28PM

5 A. It says, "not to mention your considerable and 03:28PM
6 costly efforts to bankroll an investigation into 03:28PM
7 Dominion." They were upset about that. Huh. Okay. 03:28PM

8 Q. (BY MS. WRIGLEY) And you see the second to 03:29PM
9 last paragraph that stated, "With this letter, Dominion 03:29PM
10 renews its demand you retract your defamatory 03:29PM
11 accusations immediately and issue a public apology" -- 03:29PM

12 A. Yeah. Now I see that. 03:29PM

13 Q. -- "for damaging Dominion's reputation with 03:29PM
14 completely fabricated claims of fraud and corruption." 03:29PM

15 A. Uh-huh. 03:29PM

16 Q. "Dominion has been forced to expend substantial 03:29PM
17 monetary sums to protect the health and safety of its 03:29PM
18 employees following innumerable death threats from the 03:29PM
19 social media mob that your statements have agitated 03:29PM
20 against Dominion." Do you see that? 03:29PM

21 A. Uh-huh. 03:29PM

22 Q. And were you aware of this damage that Dominion 03:29PM
23 claimed it was suffering from the campaign -- 03:29PM

24 A. And they were -- 03:29PM

25 MR. KACHOUROFF: Objection to the 03:29PM

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1 characterization of damage or that Dominion spent any 03:29PM
2 more money that it typically would in association -- 03:29PM

3 A. Well, this is the first time I'm reading this, 03:29PM
4 because I see on the next page it mentions their little 03:29PM
5 witnesses, Katie Hobbs, Brad Raffensperger, Gabriel 03:29PM
6 Sterling. Every one of these people now, three years 03:29PM
7 later, I have evidence on every single one of them that 03:29PM
8 they have committed some bad things. Every one of them 03:30PM
9 lies. These are five lies right in a row, proven 03:30PM
10 lies -- 03:30PM

11 Q. (BY MS. WRIGLEY) Sir -- 03:30PM

12 A. -- all five of them. 03:30PM

13 Q. Mr. Lindell -- 03:30PM

14 A. But I never read it, because if I'd have read 03:30PM
15 it back then, I would have pulled this out a long time 03:30PM
16 ago. 03:30PM

17 Q. Mr. Lindell, you're on Page 3, correct, with 03:30PM
18 the bullet points? 03:30PM

19 A. Yeah, Page 3 where they bring up Katie Hobbs, 03:30PM
20 crooked Clint Hickman, Brad Raffensperger, the biggest 03:30PM
21 blocker, corrupt Republican this country's ever seen. 03:30PM

22 Q. Okay. So let me just walk through this. 03:30PM

23 The first bullet point references a 03:30PM
24 Republican from Maricopa County in Arizona, Clint 03:30PM
25 Hickman, correct? 03:30PM

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1	A. Yes.	03:30PM
2	Q. And he's --	03:30PM
3	A. It says no evidence of fraud.	03:30PM
4	Q. He's a fraudster based on your view of him?	03:30PM
5	A. What's that?	03:30PM
6	Q. You view him to be --	03:30PM
7	MR. KACHOUROFF: Objection. Now you're	03:30PM
8	being argumentative now. He never said he was a	03:30PM
9	fraudster.	03:30PM
10	Q. (BY MS. WRIGLEY) Do you view Maricopa County	03:30PM
11	Board of Supervisors Chairman Clint Hickman --	03:30PM
12	A. These -- these guys --	03:30PM
13	Q. -- to have done something wrong, sir?	03:30PM
14	A. Wait. Now, wait. Because he said that. It's	03:30PM
15	a lie. Now it's a proven lie.	03:30PM
16	Q. He's a liar?	03:30PM
17	A. It's a -- he's a liar. Absolute liar. Either	03:30PM
18	that or he's very misconstrued. One or the other.	03:30PM
19	Either he didn't do his job as a supervisor and dig into	03:30PM
20	it like I did, or he's a liar. It's only one of the	03:31PM
21	two. Either you're a liar or you didn't do the due	03:31PM
22	diligence you should have done.	03:31PM
23	Why should a guy have to go out and do all	03:31PM
24	this due diligence for the whole country? These guys	03:31PM
25	should have done their own due diligence there. So he's	03:31PM

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1 a liar.

03:31PM

2 Q. How about Arizona Secretary of State, Katie
3 Hobbs?

03:31PM

03:31PM

4 A. She's as crooked as the day is long.

03:31PM

5 Q. Got it.

03:31PM

6 A. She -- we have more stuff on her crimes and
7 probably more than Janet Griswold from Colorado.

03:31PM

03:31PM

8 Q. And then if I go down a little bit, there's a
9 Gabriel Sterling, who's a voting systems implementation
10 manager in --

03:31PM

03:31PM

03:31PM

11 A. Yeah. Him and Raffensperger. If you're a
12 Democrat in Georgia, don't come our way. Georgia's so
13 corrupt, and Brad Raffensperger is the -- he's the --
14 probably the worst blocker in the country. I call that
15 a deviation.

03:31PM

03:31PM

03:31PM

03:31PM

03:31PM

16 Why wouldn't Brad have wanted to look into
17 it? He hid the Curling case for three and a half years.
18 He didn't even testify in -- this January when they
19 needed him to testify. Why didn't you testify, Brad?

03:31PM

03:31PM

03:31PM

03:31PM

20 Q. And so you're referring to the Secretary -- the
21 Georgia Secretary of State Brad Raffensperger. You
22 think he's involved with wrongdoing, sir?

03:31PM

03:31PM

03:31PM

23 A. Wrong with what?

03:31PM

24 Q. Involved in wrongdoing?

03:32PM

25 A. A hundred percent. It's not even a question.

03:32PM

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1 And based on what I know, not on hearsay. I got more on 03:32PM
2 Brad Raffensperger than anyone in the country. He 03:32PM
3 should be in prison. When we melt down these machines, 03:32PM
4 he will be the first one behind bars, trust me. 03:32PM
5 Terrible guy. 03:32PM

6 Q. Okay. And in this letter, do you see that it 03:32PM
7 refers to a lawsuit that -- 03:32PM

8 A. I've never read this entirely. 03:32PM

9 Q. -- was filed by -- against Sidney Powell by 03:32PM
10 Dominion? 03:32PM

11 A. I've never read this till right now, seriously. 03:32PM
12 Never read this in my life. 03:32PM

13 Q. All right. I'm going to show you another 03:32PM
14 document, and this is going to be 629, for the record. 03:32PM

15 (Exhibit 629 marked.) 03:32PM

16 MS. WRIGLEY: This is Exhibit 629. 03:32PM

17 MR. KACHOUROFF: Thank you. 03:32PM

18 Q. (BY MS. WRIGLEY) Do you recognize this 03:32PM
19 document, sir? 03:32PM

20 A. Yeah. You just gave me the same document. 03:32PM

21 Q. Do you see on the first page, it looks like you 03:32PM
22 forward it to yourself on March 27, 2021? 03:33PM

23 A. What's that now? 03:33PM

24 Q. On the first page, it's an -- there's an E-mail 03:33PM
25 at the top. Do you see that? 03:33PM

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1 A. Yeah, because I -- I -- this is -- this is the 03:33PM
2 only one I actually read. Because you see where I 03:33PM
3 forwarded M Lindell? I never use that E-mail. I use 03:33PM
4 Mike@MyPillow for every single conversation I ever had, 03:33PM
5 no matter what company it is or what it is. So I must 03:33PM
6 have found that in the M Lindell and I forwarded it to 03:33PM
7 myself. This is actually one I read. 03:33PM

8 Q. And you read this letter from Dominion's 03:33PM
9 lawyers? 03:33PM

10 A. This one right here. 03:33PM

11 Q. Yes. 03:33PM

12 A. The other two I probably hadn't even seen. I 03:33PM
13 know I've never seen this one before. 03:33PM

14 Q. But 629 is the same as the letter in 628, 03:33PM
15 correct, that we just looked at? 03:33PM

16 A. "We write you again..." 03:33PM

17 Oh. So this is the same one I just 03:33PM
18 E-mailed to myself. 03:33PM

19 Q. And you -- 03:33PM

20 A. That's when I read it then. I would have first 03:34PM
21 read it on March 27th of 2021. 03:34PM

22 Q. But you had -- you did read this letter from 03:34PM
23 Dominion's lawyers, correct? 03:34PM

24 A. Then I must have read it on March 27th of 2021. 03:34PM
25 Because if I E-mailed it to my real E-mail, I would have 03:34PM

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1	read it.	03:34PM
2	Q. I'm going to hand you Exhibit 630, sir.	03:34PM
3	(Exhibit 630 marked.)	03:34PM
4	Q. (BY MS. WRIGLEY) Do you recognize this	03:34PM
5	document? For the record, it's --	03:34PM
6	A. No.	03:34PM
7	Q. -- DEF 004727. It has an attachment 4728 with	03:34PM
8	11 pages for the attachment.	03:34PM
9	MR. KACHOUROFF: Sorry. What number?	03:34PM
10	MS. WRIGLEY: 630.	03:34PM
11	Q. (BY MS. WRIGLEY) Do you see on the first page	03:34PM
12	you forwarded it to yourself?	03:34PM
13	A. Yeah.	03:34PM
14	Q. And you forwarded it on February 5th, 2021?	03:34PM
15	A. Okay.	03:34PM
16	Q. Do you see that, sir?	03:34PM
17	A. Yeah.	03:34PM
18	Q. And that would have been the date of "Absolute	03:34PM
19	Proof," correct?	03:34PM
20	A. Yeah.	03:34PM
21	Q. And if you look at the attachment, this is	03:34PM
22	another letter from Dominion's lawyers, correct?	03:34PM
23	A. Right. I know I didn't read this one because I	03:34PM
24	was a little busy that day.	03:35PM
25	Q. Is this the one you called the Mafia letter,	03:35PM

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1 sir?

03:35PM

2 A. No. The Mafia letter is one almost 200 and
3 some people got, and it's threatening them. A lot of
4 them went out and got home security systems and stuff.
5 They were very scared by Dominion. It was almost don't
6 talk.

03:35PM

03:35PM

03:35PM

03:35PM

03:35PM

7 And we had over -- I think over -- it was a
8 lawsuit that we -- I actually hired Alan Dershowitz and
9 another lawyer for it that we -- to sue -- no, went
10 after Dominion, and they sent all these threatening
11 letters to all these people. I don't know where it
12 ended up, but it was mostly in Michigan. We had --
13 they -- it was hundreds of people.

03:35PM

03:35PM

03:35PM

03:35PM

03:35PM

03:35PM

03:35PM

14 Q. Now, looking at the first page of this letter,
15 February 4th, 2021, which you forwarded to yourself on
16 the 5th of February, that first paragraph states, "For
17 months, you have been lying about Dominion in order to
18 financially enrich yourself and MyPillow, Inc. by
19 selling more MyPillow products to Trump supporters who
20 tuned or attended rallies because they wanted to hear
21 that the election was stolen" -- "had been stolen and
22 that Trump would have another term in office. In
23 support of your defamatory marketing campaign, which we
24 understand has boosted your sales considerably, you have
25 repeatedly claimed to have evidence and a hundred

03:35PM

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